

Heinz Binder (CA 87908)
Wendy W. Smith (CA 133887)
Binder & Malter
2775 Park Avenue
Santa Clara, CA 95050
Telephone: (408) 295-1700
Facsimile: (408) 295-1531

Hearing Date and Time: October 25, 2007
Objection Date: October 20, 2007

Andrew L. Margulis, Esq.
Ropers, Majeski, Kohn & Bentley
17 State Street, Suite 2400
New York, New York 10004
Tel: 212-668-5927
Fax: 212-668-5929

Attorneys for Creditor, Technology Properties Ltd.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In Re)	CASE NO. 05-44481 (RDD)
)	
)	Chapter 11
)	
DELPHI CORPORATION, et al.)	(Jointly Administered)
)	
)	
Debtors.)	

**NOTICE OF MOTION OF TECHNOLOGY PROPERTIES LTD.
FOR ENTRY OF ORDER TEMPORARILY ALLOWING CLAIMS
FOR VOTING ON PLAN PURSUANT TO FED. R.BANKR.P. 3018(a)**

PLEASE TAKE NOTICE that on October 2, 2007, Technology Properties, Ltd., (“TPL”), filed its Motion for Entry of Order Temporarily Allowing Claims for Voting on Plan Pursuant to Fed. R. Bankr. P. 3018(a) (the “Motion”). TPL has filed an unliquidated claim for patent infringement in this case. These claims are in the process of being estimated. This Motion requests that the Court allows TPL to vote on the Debtor’s proposed Plan if TPL’s claim is estimated at an amount greater than zero.

PLEASE TAKE FURTHER NOTICE that a hearing to consider approval of the Motion will be held on October 25, 2007, before the Honorable Robert D. Drain, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 610, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that objections, if any, to approval of the Motion (a) must be in writing, (b) must conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York and the Order Under 11 U.S.C. §§102(a) and Fed. R. Bankr. P. 2002(m), 9006, 9007, and 9014 Establishing (I) Omnibus Hearing Dates, (II) Certain Notice, Case Management, and Administrative Procedures, and (III) Scheduling an Initial Case Conference in Accordance With Local Bankr. R. 1007-2(e) (the “Case Management Order”) (Docket No. 245), (c) must be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) – registered users of the Bankruptcy Court’s case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format), (d) must be submitted in hard-copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, and (e) and must be served upon (i) Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Attn: General Counsel), (ii) counsel to the Debtors, Skadden, Arps, Slate, Meagher & Flom LLP, 333 West Wacker Drive, Ste. 2100, Chicago, Illinois 60606 (Attn: John Wm. Butler), (iii) counsel for the agent under the Debtors’ pre-petition credit facility, Davis Polk & Wardell, 450 Lexington Avenue, New York, New York 10017 (Attn: Marlane Melican), (iv) counsel for the official committed of unsecured creditors, Latham & Watkins, 885 Third Avenue, New York, New York 10022 (Attn: Robert J. Rosenberg and Mark A. Broude), (v) counsel for Technology Properties Ltd., Binder & Malter, LLP, 2775 Park Avenue, Santa Clara, CA 95050 (Attn: Wendy W. Smith); and (vi) the Office of the United States Trustee for the Southern District of New York,

33 Whitehall Street, Ste. 2100, New York, New York 10004 (Attn: Alicia M. Leonhard), in each case so as to be received no later than (5) days prior to the date scheduled for the hearing on the Motion (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that only those objections made in writing, in accordance with the Case Management Order, and timely filed and received by the Objection Deadline will be considered by the Bankruptcy Court at the Hearing. If no objections to the Motion are timely filed and served in accordance with the procedures set forth herein, the Bankruptcy Court may enter an order granting the Motion **without further notice**.

Dated: October 2, 2007

BINDER & MALTER, LLP

By: /s/ Wendy W. Smith
Wendy W. Smith (CA 133887)
2775 Park Ave
Santa Clara, Ca 95050
Tele: (408) 295-1700
Fax: (408) 295-1531
Email: wendy@bindermalter.com
Attorneys for Technology Properties, Ltd.